#### **REMARKS**

Please reconsider the present application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering the present application.

## I. Disposition of Claims

Claims 1-20 are pending in the present application. Claims 1, 6, 11, 15, and 19 have been amended.

## II. Claim Amendments

Independent claims 1, 6, 11, 15, and 19 have been amended to incorporate the limitation that an area capacitance of the wire load model generated by the curve-fitting engine is determined substantially according to  $C_a = W \times C_{a0} \times \frac{S}{S + S_a}$ , where  $C_a$  represents area capacitance, W represents a width,  $C_{a0}$  represents a first order area capacitance, S represents a spacing, and  $S_a$  represents an area capacitance spacing. No new matter has been added by way of these amendments as support for these amendments may be found, for example, in paragraph [0024] of the Specification of the present application.

# III. Rejection(s) under 35 U.S.C § 102

<u>U.S. Patent No 5,629,860</u>

Claims 15-19 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,629,860 issued to Jones et al. (hereinafter "Jones"). For the reasons set forth

below, reconsideration of this rejection is respectfully requested.

The present invention is directed to a technique for generating an accurate wire load model. A field-solver inputs a interconnect configuration to generate parasitic information comprising resistance and capacitance information for the interconnect configuration. This parasitic information is stored in some accessible format, and, in turn, is used by a curve-fitting engine to generate a wire load model. Moreover, the present invention as recited in amended independent claims 15 and 19 requires generating that an area capacitance of the wire load model generated by the curve-fitting engine be determined according to  $C_a = W \times C_{a0} \times \frac{S}{S + S_a}$ , where  $C_a$  represents area capacitance, W represents a width,  $C_{a0}$  represents a first order area capacitance, S represents a spacing, and  $S_a$  represents an area capacitance spacing. See Specification, paragraph [0024].

Jones, in contrast to the present invention, fails to disclose a curve-fitting engine that determines an area capacitance of a wire load model according to the equation recited in amended independent claims 15 and 19. In view of the above, Jones fails to show or suggest the present invention as recited in amended independent claims 15 and 19. Thus, amended independent claims 15 and 19 are patentable over Jones. Dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

#### U.S. Patent No 5,629,860

Claims 15, 16, and 18 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,694,344 issued to Yip et al. (hereinafter "Yip"). For the reasons set forth below, reconsideration of this rejection is respectfully requested.

Yip, in contrast to the present invention, fails to disclose a curve-fitting engine that determines an area capacitance of a wire load model according to the equation recited in amended independent claim 15. In view of the above, Yip fails to show or suggest the present invention as recited in amended independent claim 15. Thus, amended independent claim 15 is patentable over Yip. Dependent claims 16 and 18 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

## U.S. Patent No 6,175,947

Claims 1-20 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,175,947 issued to Ponnapalli et al. (hereinafter "Ponnapalli"). For the reasons set forth below, reconsideration of this rejection is respectfully requested.

Ponnapalli, in contrast to the present invention, fails to disclose a curve-fitting engine that determines an area capacitance of a wire load model according to the equation recited in amended independent claims 1, 6, 11, 15, and 19. In view of the above, Ponnapalli fails to show or suggest the present invention as recited in amended independent claims 1, 6, 11, 15, and 19. Thus, amended independent claims 1, 6, 11, 15, and 19 are patentable over Ponnapalli. Dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

#### U.S. Patent No 6,291,254

Claims 1-20 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,291,254 issued to Chou et al. (hereinafter "Chou"). For the reasons set forth

below, reconsideration of this rejection is respectfully requested.

Chou, in contrast to the present invention, fails to disclose a curve-fitting engine that determines an area capacitance of a wire load model according to the equation recited in amended independent claims 1, 6, 11, 15, and 19. In view of the above, Chou fails to show or suggest the present invention as recited in amended independent claims 1, 6, 11, 15, and 19. Thus, amended independent claims 1, 6, 11, 15, and 19 are patentable over Chou. Dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

U.S. Patent Application Serial No. 09/989,597 Attorney Docket No. 03226.102001; P5991

## IV. Conclusion

Applicant believes this reply to be fully responsive to all outstanding issues and place this application in condition for allowance. If this belief is incorrect, or other issues arise, do not hesitate to contact the undersigned or his associates at the telephone number listed below. Because the amendments simplify the issues for allowance or appeal, and do not constitute new matter, entry thereof is respectfully requested. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226.102001;P5991).

Date: 5/29/03

Respectfully submitted,

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